REMARKS

This application has been carefully reviewed in light of the Office Action mailed December 22, 2004. Claims 1-51 are pending in the application. Claims 1, 21 and 39 have been amended. Claims 50 and 51 have been allowed and Claims 52-56 have been added. Applicants respectfully request reconsideration and favorable action of all pending claims in view of the following remarks.

Rejections Under 35 U.S.C. § 103

Claims 1-16, 18, 19, 21-37, 39-43, 45, and 47-49 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 5,850,516 to Schneier (*"Schneier"*) in view of U.S. Patent 5,991,881 to Conklin et al. (*"Conklin"*). Applicants respectfully traverse these rejections for the reasons discussed below.

Claim 1, as amended, recites "storing data representative of network activity in datasets, the datasets including root datasets each having a root keyset and child datasets each having a child keyset with **a key combination being a subset of, and less granular than**, a root keyset," but the cited references do not teach this limitation. Rather, the portion of *Schneier* relied on in the Office Action involves an attack tree in which a goal node has associated child nodes in which it is necessary to accomplish activities associated with the child nodes to achieve the goal of the goal node. See Fig. 3, Column 6, lines 25-66. This does not teach a key combination of a child keyset **being a subset of, and less granular than**, a root keyset, however. Clearly, *Schneier* does not involve a subset relationship. For example, "pick lock 303" of Figure 3 is not a subset of "open safe 301," even though "pick lock 303" may be one way to achieve the goal of "open safe," nor is "pick lock" less granular that "open safe." In contrast, according to one embodiment described in Applicants' specification, the keyset "AxBx" is a subset of "AaBb" and is less granular. See page 16, lines 3-9. *Conklin* was used in the Office Action primarily to teach the use of keysets, but does not overcome the above-described deficiency in the proposed combination, as it also fails to disclose this limitation. For at least this reason, Claim 1 is allowable, as are the claims depending therefrom. Independent Claims 21 and 39 are allowable for analogous reasons, as are the claims depending therefrom. Favorable action is requested.

Allowable Subject Matter

Applicants appreciate the statement in the Office Action at Page 7 that Claims 50 and 51 are allowable and that Claims 17, 20, 38, 44, and 46 would be allowable if rewritten in independent form. Applicants have rewritten Claims 17, 20, 38, 44, and 46 in independent form as new Claims 52-56. Favorable action is requested.
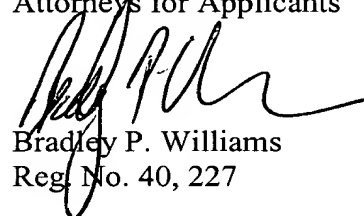
Conclusion

Applicants have made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicants respectfully request full allowance of all pending claims.

If the Examiner believes that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact the undersigned Attorney for Applicants at the Examiner's convenience.

Applicants enclose a check in the amount of $1,200.00 for adding five (5) new claims. However, the Commissioner is hereby authorized to charge any additional fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

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